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June 6, 2023

**VIA EMAIL**

United States Attorney  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

Michael Blume  
Joseph Marutollo  
Paulina Stamatelos  
Assistant United States Attorneys

**Re: *United States v. Rare Breed Triggers, LLC, et al.***  
**Civil Action No. 1:23-cv-00369-NRM-RML**

Dear Counsel:

This firm represents Defendants in the captioned matter. In furtherance of the parties' scheduling call on May 31, we are producing documents Bates-numbered RTF 0000001-6071, which can be downloaded from the following link: [REDACTED]

We also write to provide our understanding of Defendants' document collection process to date:<sup>1</sup>

- We understand that the following Rare Breed Triggers email accounts were forensically collected: dealersales@rarebreedtriggers.com, admin@rarebreedtriggers.com, customerservice@rarebreedtriggers.com. This collection resulted in 77,668 documents. The following search terms were applied to this collection, which produced approximately 8,000 documents: ATF letter, ATF approval, Illegal, Legality, Legal, Machinegun, Machine gun, Full auto.
- In addition, we understand a self-collection search was made of Defendant Lawrence DeMonico's Gmail account, with such search based on the following search conditions: Wolf Tactical and AR1 Trigger; Wolf Tactical and US Patent Number 10,514,223; Iberiabank, N.A.; Cole Leleux and RBT or RBF; Kelly Leleux and RBT or RBF; Michael Register and RBT or RBF; Jennifer Pierson and RBT or RBF; Chase Paymentech; JP Morgan Chase; Kevin Maxwell; Rick Vasquez; Rick Vasquez Firearms, LLC; 10,514,223; and any documents to/from RBT or RBF, resulting in 1,956 documents.
- We also understand a search of admin@rarebreedfirearms.com for all documents to/from

<sup>1</sup> As you know, this firm filed a notice of appearance in this matter on May 24, 2023.

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RBT was performed and 37 documents collected. Finally, there was a general gathering of documents that include many pleadings, agreements, and USPTO documents.<sup>2</sup>

We also write to advise that Defendants do not plan to contest the subpoenas issued to JP Morgan Chase and Fifth Third Bank on May 16, 2023.<sup>3</sup>

Very truly yours,  
DHILLON LAW GROUP INC.

By: */s/ Josiah Contarino*  
Josiah Contarino

cc: David A. Warrington (via email)  
Michael A. Columbo (via email)

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<sup>2</sup> As discussed on the parties' May 31 all, Defendants will be completing the objections and responses to Plaintiff's demands, and all rights in that regard are reserved.

<sup>3</sup> On the parties' May 31 call, AUSA Blume raised the possibility of Defendants identifying what subpoenas they could determine would not be challenged, *not* what subpoenas would be challenged, as AUSA Stamatelos's June 1 email suggests. Defendants may, of course, decide to not challenge other subpoenas, but that determination has not yet been made.